

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Andrew Ian White, Debtor

**Case No. 25-00752-JAW
CHAPTER 13**

MOTION TO ADJUST PLAN PAYMENT

COMES NOW, Debtor, by and through counsel, and moves this Court to adjust the plan payments, and in support thereof, would show the Court as follows:

1. Debtor commenced this case on March 21, 2025, by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. That the bar date for filing proof of claims was May 30, 2025, for all creditors and September 17, 2025, for government entities.
3. That all expected government claims have been filed.
4. That Debtor's monthly plan payment should be recalculated to only pay timely filed claims over the full sixty (60) months of the plan.

WHEREFORE, Debtor prays that the Trustee recalculate the plan payment to pay only the timely filed claims over the full sixty (60) months through their bankruptcy plan and for such additional or alternative relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel:

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion were forwarded on June 19, 2025, to:

By Electronic CM/ECF Notice:

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.